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## REQUESTS

## GENERAL INFORMATION

- 1. Identify the person(s) answering these Requests on behalf of the Respondent. GREG. POULOS
- 2. For each and every Request contained herein, identify all persons consulted in the preparation of the answer.
- 3. For each and every Request contained herein, identify all documents consulted, examined or referred to in the preparation of the answer and provide true and accurate copies of all such documents.
- 4. If you have a reason to believe that there may be persons able to provide a more detailed or complete response to any Request contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have. Brask information or documents that they may have. Brask information mass Trask Co.

  5. Identify all persons, including Respondent's employees, who have
- 5. Identify all persons, including Respondent's employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal or other handling of materials at, or transportation of materials to the Site.
- 6. For each and every Request contained herein, if information responsive to this Information Request is not in your possession, custody or control, then identify the persons from whom such information may be obtained.

  See Brask, above
- 7. If you have answered any of these requests in a previous Information Request letter, please specify the date of the letter and the request to which you have responded relevant to Coakley Landfill.

## FINANCIAL/CORPORATE INFORMATION

8. Please state the correct legal name of your town, company, agency or business. For towns, provide the name and address of the current primary officer or town manager of your town. For companies, provide the name and address of the current president and chairman of the board of directors of your company. Additionally, please state any other names by which your company has been known. OLYMPIA SPORT CENTER INC.

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9. If the company is or was a subsidiary of another corporation,

If the company is or was a subsidiary of another corporation, identify such other corporation and state the dates during which the parent/subsidiary relationship existed and the name and address of that corporation president and chairman of the board

and other officers.

\* as we have not generated hazardous wasto we are not, filling in at this time. However, should EPA's investigation require this data, we would be happy to furnish it.

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- 10. Identify the state of incorporation and the agent for service of process for all companies identified in response to Requests 8 and 9 above. For towns, include all notice and/or service of process requirements. MAINE
- 11. Please state the nature of Respondent's business and briefly describe its operation. Sporting goods retail
- 12. Identify all liability insurance policies held by Respondent from 1960 to the present. In identifying such policies, state the name and address of each insurer and of the insured, the amount of coverage under each policy, the commencement and expiration dates for each policy, whether or not the policy contains a "pollution exclusion" clause, and whether the policy covers or excludes sudden, non-sudden or both types of accidents.
- 13. Identify Respondent's current assets and liabilities and current net worth.

## GENERATOR/TRANSPORTER INFORMATION

- Have you or any person working with you or on your behalf ever accepted <u>materials</u> (hazardous and non-hazardous) for transportation to the Site from any person? If the answer to this question is anything but an unequivocal no, identify:
  - a. All persons, including yourself, from whom you or such other persons accepted materials for transportation to the Site.
  - b. In general terms, the nature and quantity of all nonhazardous materials accepted for transportation to the Site.
  - c. The nature of the hazardous materials accepted for transportation to the Site including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process which generated the material.
  - d. The persons from whom you accepted hazardous materials.
  - e. Every date on which you transported hazardous materials to the Site.
  - f. The owners of the hazardous materials that were accepted for transportation.
  - g. The quantity (weight and volume) of hazardous materials brought to the Site.
  - h. All tests, analyses, analytical results and manifests concerning each hazardous material accepted for transportation to the Site.

K

N/A

- i. The precise location(s) at the Site to which each hazardous material was transported.
- j. The persons who selected the location to which you would take each hazardous material. Where such persons intended to have the hazardous materials involved in each arrangement treated or disposed of and all evidence of their intent.
- k. Who selected the Site as the location to which you would take each hazardous material.
- 1. The amount you were paid for accepting the hazardous materials for transportation, the method of payment and the identity of the persons who paid.
- m. The amount you paid to dispose of the hazardous material at the Site, the method of payment and the identity of all persons whom you paid. Please provide copies of all contracts or agreements you have had with the City of Portsmouth. NH.
- n. All sites at which such hazardous materials were transshipped through, or were stored or held at, prior to their final treatment or disposal.
- o. What was done to the hazardous materials after they were transported to the Site.
- p. The final disposition of each of the hazardous materials brought to the Site.
- q. The markings on, type and number of containers in which the hazardous materials were stored when they were accepted and when they were left at the Site.
- r. The permit number(s) assigned to you by the City of Portsmouth. This number identified you as a person able to dispose of materials at the Coakley Landfill Site. In addition, if you have a list of any or all other users of the landfill with or without assigned permit numbers, please provide that information.
- 15. Have you arranged for disposal or treatment, or transportation for disposal or treatment, of hazardous materials to the Site? If the answer to this question is anything but an unequivocal no, identify:
  - a. All persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of hazardous materials at or to the Site (or any transshipment site).



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- The persons with whom you made such arrangements.
- c. Every date on which each of you made such arrangements. The nature, including the chemical content, characteristic, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous materials involved in each such arrangement.
  - In general terms, the nature and quantity of non-hazardous materials involved in each such arrangement.

    Cardboard + paper in a dumpster served by the mall.

    The owner of the hazardous materials involved in each such
  - f. arrangement.
  - All tests, analyses, analytical results or manifests concerning each hazardous material involved in such transactions.
  - The precise locations at which each hazardous material involved in such transactions actually was disposed or treated.
  - Who selected the location within the Landfill to which the hazardous materials were to be disposed or treated.
  - Who selected the Site as the location at which hazardous materials were to be disposed or treated.
  - k. The amount paid in connection with each such arrangement, the method of payment and the identity of the persons involved in each arrangement.
  - Where the persons identified in "k" above intended to have the hazardous materials involved in each arrangement treated or disposed and all evidence of their intent.
  - All intermediate sites to which the hazardous materials involved in each arrangement were transshipped, or at which they were stored or held, any time prior to final treatment or disposal.
  - What was done to the hazardous materials once they were brought to the Site.
  - The final disposition of each of the hazardous materials involved in each arrangement.
  - The measures taken by you to determine how and where treatment or disposal of the hazardous materials involved in each arrangement would actually take place.

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The markings on and type, condition and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal

were stored, or treatment.

r. The permit number(s) assigned to you by the City of Portsmouth. This number identified you as a person able to dispose of materials at the Coakley Landfill Site. In addition, if you have a list of any or all other users of the landfill with or without assigned permit numbers, please